

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<hr/>		: CHAPTER 13
In re:	:	
	:	
	:	Bankruptcy No.: 22-11096 (MDC)
MATTHEW JOHN MAJERNIK	:	
	:	
Debtor.	:	
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**MARY MAJERNIK AND TOM AND JANET SWAYNE’S REMOTE WITNESS LIST
AND EXHIBIT LIST FOR HEARING ON MOTION TO DISMISS OR CONVERT,
NOVEMBER 8, 2022**

Pursuant to the order of this Court, Mary Majernik (“Mary”) and Tom and Janet Swayne (the “Swaynes”), submit the following Remote Witness List and Exhibit List:

Remote Witness List

1.
 - a. Mary Majernik, Debtor’s separated spouse and creditor
 - b. Mary will testify as to the state of her shared finances and assets with the Debtor and any family law financial obligations to their daughter that will continue postpetition.
 - c. maryeswayne@yahoo.com
 - d. Horsham, PA
 - e. Witness will testify from her home.
 - f. No one else will be present in the room with this witness.
 - g. Witness will only have access to the documents included on this Exhibit List, and any exhibits served by any other parties for the purposes of cross-examination.

2.
 - a. Tara Burns, Family Court counsel to Mary Majernik
 - b. Attorney Burns will **only** testify if necessary to rebut Debtor’s or Debtor’s counsel’s testimony about prepetition family law disputes which have no postpetition impact on

the Debtor or his case. If the Debtor attempts to offer this irrelevant testimony, the movants will object to its introduction, and will only offer the testimony of this witness to the extent that such evidence is admitted.

- c. tara.burns@obermayer.com
- d. Philadelphia, PA
- e. Witness will testify from her office or home.
- f. No one else will be present in the room with this witness.
- g. Witness will only have access to the documents included on this Exhibit List, and any exhibits served on him by any other parties for the purposes of cross-examination.

Exhibit List

1. DI #1: Debtor's petition and schedules
2. DI #2: Debtor's Chapter 13 Plan
3. DI #16: Chapter 13 trustee's objection to confirmation
4. DI #18: Mary Majernik and Thomas and Janet Swayne's Objection to confirmation and to exemptions
5. DI #19: Mary Majernik's motion for relief from stay
6. DI #22: Debtor's response to motion for relief from stay
7. DI #25: Order granting motion for relief from stay
8. DI #32: Mary Majernik and Thomas and Janet Swayne's motion to dismiss or convert
9. DI #36: Debtor's response to motion to dismiss or convert
10. DI #39: Debtor's amended statyement of financial affairs
11. DI #40: Debtor's amended schedule E/F
12. DI #41: Debtor's First Amended Chapter 13 Plan
13. DI #44: Debtor's amended schedule A/B

Movants reserve the right to supplement this exhibit list, and will provide any supplemental exhibits to the Court and all parties.

Respectfully submitted,

Dated: November 1, 2022

By: /s/ Turner N. Falk
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